

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

HERITAGE REALTY MANAGEMENT, INC., ) Docket No. 04-333 ERIE  
vs. ) (Judge Sean J. McLaughlin)  
Plaintiff )  
vs. ) ELECTRONICALLY FILED PLEADING  
JOHN ALLIN d/b/a ALLIN COMPANIES and SNOW MANAGEMENT GROUP, )  
Defendant ) DISCOVERY DISPUTE CERTIFICATE  
vs. )  
vs. ) Filed on behalf of: Plaintiff, Heritage Realty  
vs. ) Management, Inc.  
vs. )  
vs. ) Counsel of record for this party:  
vs. )  
vs. ) Richard A. Lanzillo, Esq.  
vs. ) Knox McLaughlin Gornall  
vs. ) & Sennett, P.C.  
vs. ) 120 West 10<sup>th</sup> Street  
vs. ) Erie, PA 16501  
vs. ) Telephone (814) 459-2800  
vs. ) Facsimile (814) 453-4530  
vs. ) Email rlanzillo@kmgslaw.com  
vs. ) PA53811

**DISCOVERY DISPUTE CERTIFICATE**

Counsel for Heritage Realty Management, Inc. does hereby certify that they have made a reasonable effort to reach agreement with opposing counsel on the matters set forth in the accompanying motion to compel. This effort has consisted of multiple phone calls and conversations with opposing counsel regarding the production of supplemental discovery ordered by the Court. Despite these efforts, opposing counsel has been unable to produce the discovery at issue.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &  
SENNETT, P.C.

BY: /s/ Richard A. Lanzillo, Esq.

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